

**COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Bay State Gas Company

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D.T.E. 06-36

**PETITION FOR LIMITED PARTICIPANT STATUS
ON BEHALF OF
ASSOCIATED INDUSTRIES OF MASSACHUSETTS**

Associated Industries of Massachusetts (A.I.M.) hereby petitions for Limited Participant status in the above captioned proceeding.

In support of its request, A.I.M. states the following:

1. Petitioner is an organization of Massachusetts companies representing more than 7,600 employers in both the manufacturing and non-manufacturing sectors in the Commonwealth. A.I.M. was founded in 1915 and has since sought to advocate positive public policy decisions to promote a vibrant and expanding economy, and retain and expand job opportunities in Massachusetts.
2. On March 31, 2006, Bay State Gas Company ("Bay State") filed a petition with the Department pursuant to 220 C.M.R. § 1.04(5), requesting approval by the Department of a proposal to implement an incremental capacity planning standard for grandfathered customers and approval of related modifications to Bay State's tariffs. The petition was docketed by the Department as D.T.E. 06-36.
3. In conducting adjudicatory hearings, the Department may "allow any person showing that he may substantially and specifically affected by the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any limited purpose" as the Department may order. *See* G.L. c. 30A section 10, cl. (4); *see, also*, 220 CMR 1.036(1)(b). A.I.M. has participated in similar D.T.E. proceedings.
4. Petitioner is responsible for representing the interests of its commercial and industrial members across the Commonwealth in various forums. A.I.M. members in the Bay State Gas Company distribution territory will be substantially affected by the proposed standby rates, and members outside of the distribution

territory will be affected by potentially precedent setting decisions made by the Department in this case.

5. A.I.M. represents specific classes of ratepayers and is qualified to represent their interests and determine if, as a customer class, they will be harmed by potential cost allocation or other proposed changes in this case.
6. A.I.M. requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to:

Robert A. Rio, Esq.
Vice President – Government Affairs
Associated Industries of Massachusetts
222 Berkeley Street, 13th Floor
P.O. Box 763
Boston, MA 02117-0763

7. Accordingly, A.I.M. seeks to participate in this proceeding as a Limited Participant with rights to receive copies of all pleadings, discovery requests and responses and to file brief(s) in accordance with the procedural schedule to be established by the Department.

Therefore, A.I.M. respectfully requests the right to participate in this proceeding as a Limited Participant.

RESPECTFULLY SUBMITTED



By: _____
Robert A. Rio, Esq.
Vice President – Government Affairs
Associated Industries of Massachusetts
222 Berkeley Street, 13th Floor
P.O. Box 763
Boston, MA 02117-0763

Date: May 25, 2006